

Exhibit B

Pospisil et al. v. ATP Tour, Inc., et al., 25-cv-2207 (MMG) (SDNY)**Proposed Case Schedule**

Event	Plaintiffs' Proposed Date	Defendants' Proposed Date
Initial Disclosures (Case Management Plan 7(b))	7/7/25	14 days from a decision on the motions to dismiss
Deadline to Serve Initial Document Requests (Case Management Plan 7(e))	7/7/25	60 days from a decision on the motions to dismiss
Deadline to Serve Local Rule 33.3(a) Interrogatories (Case Management Plan 7(g)(i))	7/7/25	60 days from a decision on the motions to dismiss
Deadline Regarding ESI Protocol (Case Management Plan 7(d))	30 days following the entry of the Civil Case Management Order	30 days following the entry of the Civil Case Management Order
Deadline to file a motion to amend pleadings or join parties (Case Management Plan 6(a))	1/30/26	30 days following the Initial Pretrial Conference
Substantial Completion of Document Production by the Parties (Case Management Plan 7(f))	2/9/26, ¹ with rolling productions to begin by 8/1/25	3 months before the close of fact discovery.
Deadline to Serve Fed. R. Civ. P. 33 Interrogatories (Case Management Plan 7(g))	7/20/26	30 days before the close of fact discovery

¹ This deadline only applies to party discovery. This deadline contemplates prompt rolling productions, and the parties reserve all rights to challenge the sufficiency of any other party's document productions after the substantial completion deadline.

Event	Plaintiffs' Proposed Date	Defendants' Proposed Date
Deadline to Serve Requests For Admission (Case Management Plan 7(i))	7/20/26	30 days before the close of fact discovery
Close of Fact Discovery (including Completion of Depositions Pursuant to Fed. R. Civ. P. 30 and 31) (Case Management Plan 2(a) and 7(h))	8/28/26	12 months from ruling on Motions to Dismiss
Deadline for parties to meet to discuss settlement/mediation (Case Management Plan 8(a))	9/11/26	14 days following the close of fact discovery
Deadline for Plaintiffs' Motion for Class Certification (Case Management Plan 2(b))	To be discussed among all parties before the close of discovery, but, in any event, to occur before the close of expert discovery	12 months from ruling on Motion to Dismiss
Deadline for Plaintiffs to serve expert backup materials for Motion for Class Certification (Case Management Plan 2(b))	To be discussed among all parties before the close of discovery, but, in any event, to occur before the close of expert discovery	3 days after Plaintiffs' Motion for Class Certification
Deadline for Defendants' Opposition to Plaintiffs' Motion for Class Certification (Case Management Plan 2(b))	To be discussed among all parties before the close of discovery, but, in any event, to occur before the close of expert discovery	3 months after Plaintiffs' Motion for Class Certification
Deadline for Defendants to serve expert backup materials for Opposition to Class Certification Motion (Case Management Plan 2(b))	To be discussed among all parties before the close of discovery, but, in any event, to occur before the close of expert discovery	3 days after Defendants' Opposition to Class Certification Motion

Event	Plaintiffs' Proposed Date	Defendants' Proposed Date
Deadline for Plaintiffs' Reply in Support of Motion for Class Certification (Case Management Plan 2(b))	To be discussed among all parties before the close of discovery, but, in any event, to occur before the close of expert discovery	2 months after Defendants' Opposition to Class Certification Motion
Deadline for Parties to serve Opening Expert Reports on Merits and Damages under Rule 26(a)(2) (Case Management Plan 2(b) and 10(a))	9/25/26	3 months from ruling on Motion for Class Certification
Deadline for Parties to serve Rebuttal Expert Reports on Merits and Damages under Rule 26(a)(2) (Case Management Plan 2(b) and 10(a))	10/23/26	3 months from filing of Opening Expert Reports
Deadline for Parties to serve Reply Expert Reports (Case Management Plan 2(b) and 10(a))	11/20/26	N/A
Deadline to Serve Local Rule 33.3(c) Interrogatories (Case Management Plan 7(g)(ii))	12/15/26	30 days before the close of expert discovery
Close of Expert Discovery (Case Management Plan 2(b))	1/14/27	3 months from filing of Rebuttal Expert Reports
Deadline to File Summary Judgment Pre-Motion Letter or Joint Status Report (Case Management Plan 9(a))	1/28/27	14 days from Close of Expert Discovery

Event	Plaintiffs' Proposed Date	Defendants' Proposed Date
Deadline for any <i>Daubert</i> Motions (Case Management Plan 11)	30 days from Close of Expert Discovery	30 days from Close of Expert Discovery
Final Pretrial Conference (Case Management Plan 12 and 13)	To be set by the Court	To be set by the Court
Final Pre-Trial Submission (Case Management Plan 12)	To be set by the Court	To be set by the Court
Trial (Case Management Plan 13)	To be set by the Court	To be set by the Court